

**FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Application by Verizon New England Inc.)	
Bell Atlantic Communications, Inc.)	
(d/b/a Verizon Long Distance), NYNEX)	CC Docket No. 01-9
Long Distance Company (d/b/a Verizon)	
Enterprise Solutions), and Verizon Global)	
Networks Inc., for Authorization to Provide)	
In-Region, InterLATA Services in Massachusetts)	
_____)	

**JOINT DECLARATION OF SHERRY LICHTENBERG
AND MINDY CHAPMAN ON BEHALF OF WORLDCOM, INC.**

Based on our personal knowledge and on information learned in the course of our duties, we, Sherry Lichtenberg and Mindy Chapman, declare as follows:

1. I am the same Sherry Lichtenberg who, along with Patty Kwapniewski, previously filed a declaration and a reply declaration with respect to Verizon's original application to provide long distance service in Massachusetts. I also provided information used in WorldCom's ex parte letter of November 24, 2000 in responding to Verizon's reply comments.

2. My name is Mindy Chapman. I am the Director of LEC Interface Operations for WorldCom. I have over 17 years experience in the telecommunications field, all of it with WorldCom or its predecessor company, MCI Telecommunications Corporation. My current responsibilities include tracking data and order activity for all local resale and UNE-P

orders nationwide. Previously, I was Senior Manager for LEC Interface Operations with many of the same responsibilities. Between 1993 and 1997, I was a Senior Manager with nationwide responsibility for monitoring and error processing. Prior to 1993, I had a number of different jobs that included supervisory authority over groups responsible for: (1) error processing (working orders rejected by the LECs); (2) analysis of order processing systems; (3) tracking and troubleshooting customer orders, and (4) overseeing LEC compliance.

3. As part of WorldCom's prior filings, we discussed the problems WorldCom has experienced with Verizon's OSS in New York and Pennsylvania, where WorldCom is providing local residential service using UNE-P. The purpose of this declaration is to briefly update the status of those problems and to discuss one additional problem WorldCom is experiencing. We will not repeat WorldCom's earlier detailed description of the problems. Nor will we reiterate WorldCom's discussion as to why Verizon's evidence of OSS readiness is inadequate. WorldCom's explanation of the defects of the KPMG test, the fallacy of relying primarily on Verizon's experience in New York, and the limits of Verizon's commercial experience in Massachusetts remains valid.

4. The problems WorldCom has experienced with Verizon's OSS in New York and Pennsylvania have not disappeared. As WorldCom reported previously, the missing notifier problem in New York was not completely eradicated when Verizon replaced its ECXpert software in March 2000. Moreover, when WorldCom launched service in Pennsylvania, a missing notifier problem appeared there as well. Kwapniewski Decl. ¶¶ 40-49; Kwapniewski

Reply Decl. ¶¶ 5-10. Since the time of WorldCom's prior declarations, the number of missing WorldCom notifiers in New York and Pennsylvania has actually increased (although not to the level that WorldCom experienced before this Commission's intervention).

5. In July 2000, when the New York Public Service Commission ("New York PSC") relieved Verizon of the requirement of daily reporting related to missing notifiers, it reported that there were 250 missing notifiers for all CLECs. (Att. 1, p.4.)^{1/} The number has increased significantly since that time. As of January 22, 2001, WorldCom alone was missing 1,153 provisioning completion notices and 933 billing completion notices in New York – some of which were more than 6 months overdue. (Att. 2.) Since January 22, the number of missing notifiers in New York has decreased somewhat as a result of involvement by the staff of the New York PSC, which we discuss below, but the problem remains significant. As of January 31, 2001, WorldCom was missing 1,374 provisioning completion notices and 251 billing completion notices in New York. (Att. 3.) As of February 2, 2001, WorldCom was missing 1062 provisioning completion notices and 270 billing completion notices.

6. The numbers in Pennsylvania are even worse. As of January 22, 2001, WorldCom was missing 484 provisioning completion notices and 1,755 billing completion notices in Pennsylvania even though order volumes in Pennsylvania have not reached New York levels. (Att. 4.) Moreover, since January 22, the number of missing notifiers in Pennsylvania has increased dramatically. As of January 31, 2001, WorldCom was missing 558 provisioning

^{1/} WorldCom reports a notifier as missing if it is at least 3 days late.

completion notices and 3,901 billing completion notices. (Att. 5.) As of February 2, 2001, the numbers had again substantially increased: WorldCom was missing 481 provisioning completion notices and 5,574 billing completion notices as of that date. Research is underway to attempt to determine the cause of this rapid increase. It may be that Verizon is shifting resources from Pennsylvania to New York to attempt to resolve the backlog in New York due to the involvement of New York staff. In any event, it is clear is that Verizon has a significant problem with missing notifiers in both states in which WorldCom is transmitting a significant number of UNE-P orders.

7. Since Verizon replaced ECXpert with NetLink last March, WorldCom has held weekly conference calls with Verizon to attempt to resolve the notifier problem. WorldCom has also transmitted weekly lists of missing notifiers to Verizon.^{2/} This has taken substantial effort on WorldCom's part. Nonetheless, despite repeated requests from WorldCom, Verizon has never satisfactorily identified a root cause analysis to explain why notifiers remain missing after the replacement of ECXpert. Verizon also has failed to explain why it is not reflowing notifiers quickly after receiving lists from WorldCom.

8. On October 10, 2000, after the missing notifier problem appeared in Pennsylvania and increased to some extent in New York, WorldCom wrote a letter to Verizon demanding that Verizon identify a root cause and fix the problem. (Att. 6.) Verizon responded

^{2/} Verizon requested that WorldCom refrain from transmitting lists of missing notifiers on a weekly basis for a period of time in December 2000 and January 2001 so that Verizon would not be confused by multiple lists of missing notifiers. WorldCom acceded to this request.

that it had identified several systems issues that were causing the notifier problem in Pennsylvania and that it would implement fixes to resolve the problem in October and December of 2000. As for New York, Verizon indicated that one primary cause of the missing notifiers was that Verizon representatives were cancelling orders without notifying WorldCom. Verizon stated that it would work with WorldCom to resolve these orders. (Att. 7.) Unfortunately, Verizon did not resolve the missing notifier problem in either Pennsylvania or New York after transmitting its response to WorldCom.

9. WorldCom discussed Verizon's response with Verizon and determined that it was unsatisfactory. On November 1, 2000, WorldCom drafted a letter to the New York PSC staff in which it explained that it was unacceptable for Verizon to unilaterally cancel WorldCom orders. (Att. 8). Then, on December 5, 2000, WorldCom requested expedited dispute resolution from the New York staff. (Att. 9.) Verizon responded by explaining that the exception process was working to ensure missing notifiers were reflowed and by stating that the particular root cause it had previously identified for the New York notifier problem – unilateral cancellation of orders by Verizon – had been resolved. (Att. 10.) But, as WorldCom explained to the New York staff (Att. 11), while Verizon may have resolved the root cause it had previously identified, many notifiers were still missing. Verizon did not explain the cause of the remaining missing notifiers. Moreover, the fact that some notifiers had been outstanding for months shows that the PON exception process was not working as it should.^{3/}

^{3/} In January 2001, Verizon did finally provide WorldCom an assessment of root cause for a relatively small percentage of the missing notifiers. Verizon suggested that some of the missing

10. Presumably as a result of WorldCom's communication with the New York staff, Verizon has now agreed to perform a root cause analysis on all January trouble tickets related to missing notifiers in New York. Verizon also has agreed to work to clear the backlog. (The New York backlog has already decreased somewhat since the New York staff became involved although the Pennsylvania backlog has increased simultaneously.) It remains to be seen whether Verizon will carry through on its promise to determine the root causes of the notifier problem and eliminate them. Moreover, it should not take involvement of the New York staff to motivate Verizon to respond to a significant problem.

11. Indeed, Verizon's failure to reflow notifiers quickly after receiving trouble tickets on those notifiers^{4/} and its failure to determine a root cause and eliminate the problem entirely are examples of a fundamental problem with Verizon's OSS: Verizon's technical assistance remains inadequate. In fact, WorldCom has now worked with four different Verizon

notifiers in New York relate to a problem with Verizon's back-end DCAS system and some relate to a problem with Verizon's back-end CRIS system. With respect to Pennsylvania, Verizon suggested that some of the missing notifiers may result from a problem with Verizon's Request Manager system. Request Manager in Pennsylvania is the system that performs the same functions as DCAS in New York. Whether Verizon successfully fixes these problems remains to be seen.

^{4/} Verizon has obscured its poor performance in resolving trouble tickets related to missing notifiers by misinterpreting the relevant performance metric that was agreed upon in the Consent Decree before this Commission and that is now part of Verizon's New York performance plan. This metric requires Verizon to report on its timeliness in clearing trouble tickets by returning missing notifiers. But Verizon reports a trouble ticket as closed once Verizon has provided a CLEC with status information on an order even if Verizon has not returned the notifier. (Att. 1 pp.4-5) (describing Verizon's deviation from the metric). Thus, Verizon's performance reporting cannot be used to evaluate help desk timeliness in responding to trouble tickets related to missing notifiers.

teams to attempt to resolve the notifier issue, emphasizing the low priority Verizon places on resolution of this issue. Only with the involvement of the New York staff does it appear that Verizon may take any significant steps to resolve the problem.

12. In addition to Verizon's relatively poor performance in resolving trouble tickets related to missing notifiers, Verizon's help desk performance remains inadequate with respect to trouble tickets submitted for other problems. As WorldCom previously explained, and as remains true today, Verizon often fails to respond to trouble tickets for far too long. Kwapniewski Decl. ¶¶ 116-128; Kwapniewski Reply Decl. ¶¶ 17-18 . Often WorldCom will have to repeatedly escalate a trouble ticket before obtaining a response. Moreover, Verizon's help desk has recently been referring WorldCom to the TISOCs to resolve any problems caused by manual errors on the part of Verizon representatives. The help desk thus does not serve as the single point of contact it was promised to be. Finally, Verizon still has not agreed to any performance measures that can be used to evaluate help desk timeliness in responding to trouble tickets as a general matter. It also misinterprets the performance measure designed to track trouble tickets related to missing notifiers. See n.2 supra.

13. The inadequate technical assistance Verizon provides to CLECs also manifests itself in Verizon's release of inaccurate documentation. Kwapniewski Decl. ¶¶ 71-101; Kwapniewski Reply Decl. ¶¶ 12-15. As WorldCom noted in earlier declarations, KPMG found numerous inaccuracies when Verizon first published new EDI releases in February and June of 2000. Kwapniewski Decl. ¶¶ 74-77, 85-87, 95-101. Moreover, WorldCom experienced

a multitude of problems in testing Verizon's June 2000 release in New York and Pennsylvania as a result of documentation errors. Id. ¶ 77-81. Verizon has not demonstrated that its ability to release accurate documentation has improved dramatically since June 2000.

14. Verizon did implement minor EDI releases in October and December 2000. The October release was relatively smooth but was not a major release. In contrast, the December 2000 release, which was also a minor release, contained a key error. Although the release was not supposed to require any new coding by CLECs, the release did require new coding. As a result, hundreds of WorldCom orders were erroneously rejected. Verizon subsequently acknowledged and fixed the problem. But the existence of this problem, coupled with Verizon's long history of documentation problems, demonstrates that Verizon should not gain section 271 approval until it demonstrates that it can provide accurate documentation when it initially implements a major release. There has not been a major EDI release since June of last year.

15. Verizon's poor technical assistance is also apparent from its ongoing failure to provide all of the necessary documentation to CLECs regarding the implementation of ExpressTrak. Kwapniewski Decl. ¶¶ 102-115; Kwapniewski Reply Decl. ¶ 16. ExpressTrak is Verizon's new back-end billing system that will dramatically affect significant portions of Verizon's OSS. Although Verizon has begun implementation of ExpressTrak in some states, and was originally supposed to implement ExpressTrak in Massachusetts in 2000, Verizon has not yet provided a detailed roll out schedule and has not provided a true specification despite months

and months of requests. Verizon has finally agreed to allow CLECs to test ExpressTrak in February 2001, but without a true specification, such testing will be rather difficult. The piecemeal documentation Verizon has provided regarding components of ExpressTrak is no substitute for a true specification. Moreover, the months of effort WorldCom has expended in attempting to obtain an acceptable implementation plan for ExpressTrak again underscores Verizon's general failure to provide adequate technical assistance to CLECs.

16. Verizon's OSS also contains a number of other important defects: (1) Verizon continues to process too many orders manually. Kwapniewski Decl. ¶¶ 154-164; Kwapniewski Reply Decl. ¶¶ 23-25. In November, Verizon's total flow through rate in Massachusetts for resale orders was 48.73% and its simple flow through rate was 50.11%. OR5-01, 5-02. That same month, Verizon's total flow through rate in Massachusetts for UNE-P/special services was only 51.19%; its simple flow through rate was 54.00%. Id. Verizon still does not report data on achieved flow through. OR 5-03. (2) As we previously reported, Verizon's GUI (or the back-end systems to which the GUI provides access) is unavailable far too frequently. Kwapniewski Decl. ¶¶ 129-141; Kwapniewski Reply Decl. ¶¶ 19-21. Although the availability of Verizon's GUI has improved somewhat in recent weeks, in WorldCom's experience, it has not approached the 99.5% level the Commission deemed appropriate. NY Order ¶ 155. (3) Verizon's process of line loss notification is not yet sufficient. WorldCom previously discussed a number of problems that we have experienced with the line loss report. Kwapniewski Decl. ¶¶ 147-151. A recent audit of that report suggests that the problem is far

greater than we previously believed. Because WorldCom only completed this audit recently, however, WorldCom intends to discuss the issue with Verizon before detailing the extent of the problem with this Commission. (4) Verizon's performance data reveal the existence of other OSS issues. The data show that only 90.19% of resale orders and 90.51% of UNE orders were processed accurately. OR 6-01. The data also show that Verizon typically completed its own retail orders more rapidly than CLEC UNE-P and special services orders both for non-dispatch and for dispatch orders. Only 61.99% of CLEC non-dispatch orders were completed in one day compared to 79.35% for Verizon retail, for example. PR 3-01. Only 59.26 % of CLEC dispatch orders were completed in 5 days compared to 74.24% for Verizon. PR 3-09.

17. Finally, there is one OSS problem that we did not discuss in our prior declarations because it had not yet become apparent. In October, Verizon for the first time began transmitting jeopardy notifications via EDI. This was a long promised improvement that was supposed to enable CLECs to readily track jeopardies. Indeed, Verizon had proposed electronic jeopardies as a solution to some of CLECs' problems with missing notifiers (e.g., Att. 6 p.5) and the New York Commission accepted this proposal: "BA-NY . . . has proposed full implementation of electronic jeopardies by October 2000. . . . We expect that BA-NY will meet its commitment for October implementation of electronic jeopardies." (Att. 1 p.5.) Unfortunately, however, the promised improvement has proved to be deficient in practice.

18. After WorldCom began receiving jeopardies via EDI, it began comparing the EDI jeopardy reports with the OQS jeopardy reports set forth on Verizon's web site and the

e-mail jeopardy reports Verizon transmits to WorldCom. It noticed significant discrepancies among the reports. WorldCom met with Verizon several times to discuss the problem. Verizon at first asked for additional data to show that the various jeopardy reports did not match. Finally, in January 2001, Verizon acknowledged that the reports did not match. Verizon attempted to excuse this failure by asserting that LSOG 2 (the LSOG version that WorldCom is using in New York) does not have codes for all of the different types of jeopardies that Verizon transmits. Verizon also stated that even LSOG 4 (the LSOG version that WorldCom is using in Pennsylvania) does not have all of the necessary codes.

19. Verizon's excuse is not an acceptable one. Until January 2001, Verizon never indicated that the EDI jeopardy report would be incomplete. To the contrary, it assured WorldCom that the report would allow WorldCom to eliminate its reliance on any other jeopardy reports. As the New York Commission indicated, Verizon proposed "full implementation" of electronic jeopardies. (Att. 1.) WorldCom coded its interface with the expectation of relying only on EDI jeopardies. And there is nothing preventing Verizon from transmitting all jeopardies via EDI even with LSOG 2 interfaces. If Verizon uses some jeopardy codes that are not specified in LSOG 2, or LSOG 4 for that matter, it can simply add those to the interface, just as it adds codes needed for ordering products not contemplated in LSOG 2. Indeed, Verizon indicated some willingness to discuss transmission of additional jeopardies via EDI.

20. Until Verizon transmits all jeopardies via EDI, however, WorldCom will be forced to rely on three different sources of data to obtain complete jeopardy information – the

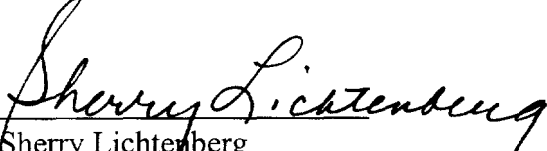
OQS reports, the e-mail transmission, and the EDI files. This is extremely arduous because these reports overlap to a significant extent. WorldCom representatives working the jeopardies on one report will often find that the same jeopardy has already been worked by someone working from a different report. Moreover, as of late, WorldCom could not use even this arduous process. WorldCom has not even been able to obtain the OQS reports for December 19, 2000 through January 9, 2001 or for January 11, 2001 to January 21, 2001 due to systems problems on Verizon's side.

21. Until Verizon shows its OSS is ready and begins providing improved technical assistance to CLECs, Verizon's section 271 application should be denied.

CONCLUSION

22. This concludes our joint declaration on behalf of WorldCom.

I declare under penalty of perjury that the foregoing Joint Declaration on Behalf
of WorldCom, Inc. is true and correct.


Sherry Lichtenberg

Executed on: 2-1-01

I declare under penalty of perjury that the foregoing Joint Declaration on behalf of WorldCom, Inc. is true and correct.


Mindy Chapman

Executed on: 2/1/01

**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 1

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on July 19, 2000

COMMISSIONERS PRESENT:

Maureen O. Helmer, Chairman
Thomas J. Dunleavy
James D. Bennett
Leonard A. Weiss
Neal N. Galvin

CASE 00-C-0008 - Complaint of MCI WorldCom, Inc. against Bell Atlantic-New York concerning Billing Completion Notices, Firm Order Commitments, Acknowledgements and tracking numbers, filed in C 99-C-1529

CASE 00-C-0009 - Complaint of AT&T Communications of New York, Inc. against Bell Atlantic-New York concerning Acknowledgments, Completion Notices and Preorder Outages, filed in C 99-C-1529

CASE 99-C-0949 - Petition filed by Bell Atlantic-New York for Approval of a Performance Assurance Plan and Change Control Assurance Plan, filed in C 97-C-0271

ORDER ADDRESSING OSS ISSUES

(Issued and Effective July 27, 2000)

BY THE COMMISSION:

BACKGROUND

Beginning in late December 1999, Staff has been investigating problems and monitoring performance associated with Bell Atlantic-New York's (BA-NY) operations support systems (OSS). Certain deficiencies in the OSS caused either delays or loss of status notifiers, and in some cases, the loss of orders.

On February 11, 2000, an order was issued directing improvements to BA-NY's wholesale service performance.¹ The order directed that BA-NY take immediate remedial action to improve its wholesale performance and to clear its backlog of trouble tickets. Additionally, BA-NY was required to file daily reports with the Director of the Office of Communications in order to allow Staff to monitor wholesale provisioning performance.

On March 23, 2000, an order was issued directing market adjustments and amending the Performance Assurance Plan (PAP).² The order directed BA-NY to provide \$10 million in bill credits for its failure to meet the requirements set forth in the February 11, 2000 order. Also, performance standards were added to the Special Provisions section of the PAP, including an additional \$2 million in credits per month to address the OSS problems. BA-NY's daily reporting requirements were continued.

In this order, we relieve BA-NY of its daily reporting requirements, approve BA-NY's proposal to provide \$100,000 in bill credits to AT&T for failure to timely implement an OSS enhancement (fielded completions), and we address several enhancements to BA-NY's OSS.

¹ Cases 00-C-0008 and 00-C-0009, Order Directing Improvements to Wholesale Service Performance (issued February 11, 2000).

² Cases 00-C-0008, 00-C-0009, and 99-C-0949, Order Directing Market Adjustments and Amending Performance Assurance Plan (issued March 23, 2000).

DISCUSSION

Daily Performance Reports

BA-NY determined that the problem of missing/delayed notifiers stemmed from a defect in a purchased software product which was part of the OSS used by CLECs. In February 2000, BA-NY replaced that software with NetLink, which has performed satisfactorily. All CLECs converted to this application by the end of March 2000.

In March 2000, the Federal Communications Commission (FCC) Enforcement Bureau concluded an investigation into BA-NY's OSS problems and found that the transition to the new software appeared to address the problems that BA-NY had experienced. The FCC and BA-NY entered into a consent agreement in which BA-NY agreed to provide, among other things, weekly reports on five performance metrics that focused on the timely receipt of notifiers.³

The weekly performance reports provided to the Commission and FCC for the period March 11, 2000 through April 28, 2000 and also the daily reports submitted to the Director of the Office of Communications demonstrate that BA-NY's performance has steadily improved. Several steps were undertaken to verify the data presented by BA-NY, including Staff's reconciliation of orders and a review of BA-NY analyses of AT&T, MCI and MetTel missing notifiers. The data and the trend are reflective of improved performance as it relates to the EDI interface. Based on BA-NY's performance, the company will be relieved from its daily reporting requirement.

³ In the Matter of Bell Atlantic-New York, Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York, Order and Consent Decree (Adopted and Issued March 9, 2000) (Consent Decree).

Backlogged Orders

During the course of the OSS problems, there were approximately 71,000 pending orders for which CLECs had not received the appropriate electronic status notifiers, primarily due to the failure of the software employed and BA-NY's inability to deal with the flow of orders on a manual basis. The missing notifiers included acknowledgements of receipt of the order, provisioning confirmations, and billing completion notices. With the implementation of the new EDI software, NetLink, the timely provision of notifiers to CLECs has substantially improved. Approximately 250 backlog orders remain to be cleared. Staff is monitoring the progress of these orders and is working with the parties in an effort to minimize adverse effects on customers.

Fielded Completions

Fielded completions parse data provided in the billing completion notices (BCNs) into formats that allow the CLECs to process that data through their systems to determine whether the services purchased by the CLECs from BA-NY match what was actually provisioned. BA-NY committed to an implementation date of April 15, 2000, which the Commission subsequently adopted in an order.⁴ BA-NY implemented the enhancement on June 17, 2000.

BA-NY claimed that a delay of the ordered implementation date was necessary, because resources were diverted to other problems and projects, including a major release in February 2000 and implementation of the new NetLink software. AT&T submitted comments asserting that it had to

⁴ Case 00-C-0140, Order Concerning Complaint of AT&T Against Bell Atlantic-New York Concerning Fielded Completion Schedule (issued February 11, 2000).

reallocate resources because of BA-NY's failure to meet its commitment date and that it had incurred extraordinary costs beginning May 22, 2000, the date when it had plans to use this function. AT&T requested that penalties be imposed. After review, BA-NY proposed to reimburse AT&T \$100,000 in bill credits to address its failure to meet the Commission's ordered implementation date of April 15, 2000. This is an equitable resolution of the issue and will be approved.⁵

Electronic Jeopardies

Jeopardies provide the CLEC with notice that an order will not be provisioned on the date specified in the firm order confirmation sent by BA-NY. This information allows the CLEC to timely inform the customer of the delay. Presently, BA-NY provides such notice using a manual process, which is neither a practical nor timely manner for notification.

BA-NY is aware of CLEC concerns on this issue and has proposed full implementation of electronic jeopardies by October 2000. Successful implementation of electronic jeopardies would enable CLECs to track the status of orders and know in advance that an order was not going to be completed by the due date, which should reduce the number of notifier trouble tickets submitted. We expect that BA-NY will meet its commitment for October implementation of electronic jeopardies. Staff will monitor BA-NY's efforts closely and will seek our intervention, if required.

⁵ AT&T was the only CLEC that had migrated to Local Service Ordering Guidelines 4.0 (LSOG4) in advance of the June 17, 2000 implementation date, and thus, was the only CLEC directly impacted.

Order Tracking and Management System

The problems experienced by CLECs with respect to the notifier problem highlighted the need for a tracking system that would allow BA-NY and the CLECs to quickly determine the status of an order in process. Such a system would enhance BA-NY's ability to respond to CLEC trouble tickets and also benefit CLECs in their tracking efforts. Moreover, a common database for tracking orders would eliminate the resource intensive efforts associated with trying to cross-index two separate databases.

BA-NY has developed, for its internal use only, a tracking system called Pontronics. This system, currently implemented for purchase order numbers (PONs) received via EDI and processed through NetLink, is designed to track a PON through the OSS (including all inbound and outbound transaction points), to ensure that all notifiers are generated. Importantly, it enables inquiry on the status of a single PON or group of PONs anywhere in the system, and it includes reporting capabilities. A tracking system accessible by CLECs as well as BA-NY would greatly improve the ordering process. BA-NY and CLECs should continue to work on this issue, moving toward implementation of an order tracking system as soon as practicable.

CONCLUSION

The OSS problems have been substantially cleared, and the daily reporting requirement is no longer needed and will be suspended. Staff will continue to follow up on issues related to the OSS to ensure that the order provisioning process continues to improve. Finally, BA-NY's proposed resolution regarding fielded completions is acceptable, and BA-NY will be directed to provide AT&T with \$100,000 in bill credits.

The Commission orders:

1. Bell Atlantic-New York is relieved of its obligation to provide daily performance reports to the Director of the Office of Communications.
2. Bell Atlantic-New York shall provide \$100,000 in bill credits to AT&T for the August billings.
3. These proceedings are continued.

By the Commission,

(SIGNED)

JANET HAND DEIXLER
Secretary

**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 2

VERIZON NY - PENDING ACKNOWLEDGEMENTS

Month	Report date	Report date	Report date	Report date	Report date	Report date
	19-Jan	22-Jan				
Jan	0	0				
Total	0	0				

VERIZON NY - PENDING CONFIRMATIONS/QUERIES

Month	Report date	Report date	Report date	Report date	Report date	Report date
	19-Jan	22-Jan				
Aug	3	3				
Sept	9	8				
Oct	17	17				
Nov	17	15				
Dec	13	11				
Jan	5	5				
Total	64	59				

VERIZON NY - PENDING PCN's Past Due Date

Month	Report date	Report date	Report date	Report date	Report date	Report date
	19-Jan	22-Jan				
June	7	6				
July	7	6				
Aug	18	16				
Sept	22	17				
Oct	133	128				
Nov	137	127				
Dec	297	289				
Jan	575	564				
Total	1196	1153				

VERIZON NY - PENDING COMPLETIONS Past Due Date

Month	Report date	Report date	Report date	Report date	Report date	Report date
	19-Jan	22-Jan				
Jun	10	7				
July	13	12				
Aug	1	1				
Sept	14	14				
Oct	64	64				
Nov	140	135				
Dec	376	383				
Jan	274	317				
Total	892	933				
TOTALS	2152	2145				

**JOINT DECLARATION OF
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ATTACHMENT 3

VERIZON NY - PENDING ACKNOWLEDGEMENTS

Month	Report date	Report date	Report date	Report date	Report date	Report date
	26-Jan	29-Jan	30-Jan	31-Jan		
Jan	0	0	0	0		
Total	0	0	0	0		

VERIZON NY - PENDING CONFIRMATIONS/QUERIES

Month	Report date	Report date	Report date	Report date	Report date	Report date
	26-Jan	29-Jan	30-Jan	31-Jan		
Sept	5	5	5	5		
Oct	6	5	5	4		
Nov	2	2	2	2		
Dec	5	5	5	3		
Jan	10	11	14	10		
Total	28	28	31	24		

VERIZON NY - PENDING PCN's Past Due Date

Month	Report date	Report date	Report date	Report date	Report date	Report date
	26-Jan	29-Jan	30-Jan	31-Jan		
June	4	4	4	4		
July	4	3	2	2		
Aug	8	7	7	7		
Sept	15	15	14	14		
Oct	117	114	113	110		
Nov	111	110	106	102		
Dec	260	257	255	239		
Jan	786	811	818	896		
Total	1305	1321	1319	1374		

VERIZON NY - PENDING COMPLETIONS Past Due Date

Month	Report date	Report date	Report date	Report date	Report date	Report date
	26-Jan	29-Jan	30-Jan	31-Jan		
Jun	3	3	3	1		
July	7	7	7	7		
Sept	5	5	5	5		
Oct	32	32	32	29		
Nov	41	41	41	38		
Dec	69	69	65	65		
Jan	91	98	91	106		
Total	248	255	244	251		
TOTALS	1581	1604	1594	1649		

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ATTACHMENT 4

VERIZON PA - PENDING ACKNOWLEDGEMENTS

	Report date	Report date	Report date	Report date	Report date	Report date
Month	19-Jan	22-Jan				
Jan	0	0				
Total	0	0				

VERIZON PA - PENDING CONFIRMATIONS/QUERIES

	Report date	Report date	Report date	Report date	Report date	Report date
Month	19-Jan	22-Jan				
Jan	2	2				
Total	2	2				

VERIZON PA - PENDING PCN's Past Due Date

	Report date	Report date	Report date	Report date	Report date	Report date
Month	19-Jan	22-Jan				
Oct	2	2				
Nov	12	12				
Dec	272	265				
Jan	190	205				
Total	476	484				

VERIZON PA - PENDING COMPLETIONS Past Due Date

	Report date	Report date	Report date	Report date	Report date	Report date
Month	19-Jan	22-Jan				
Oct	18	17				
Nov	84	83				
Dec	926	912				
Jan	712	743				
Total	1740	1755				

TOTALS	2218	2241				
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**JOINT DECLARATION OF
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& MINDY CHAPMAN**

ATTACHMENT 5

VERIZON PA - PENDING ACKNOWLEDGEMENTS

Month	Report date 26-Jan	Report date 29-Jan	Report date 30-Jan	Report date 31-Jan	Report date	Report date
Jan	0	0	0	0		
Total	0	0	0	0		

VERIZON PA - PENDING CONFIRMATIONS/QUERIES

Month	Report date 26-Jan	Report date 29-Jan	Report date 30-Jan	Report date 31-Jan	Report date	Report date
Jan	2	2	2	1		
Total	2	2	2	1		

VERIZON PA - PENDING PCN's Past Due Date

Month	Report date 26-Jan	Report date 29-Jan	Report date 30-Jan	Report date 31-Jan	Report date	Report date
Oct	1	1	1	1		
Nov	9	8	3	3		
Dec	244	212	196	192		
Jan	263	262	286	362		
Total	517	483	486	558		

VERIZON PA - PENDING COMPLETIONS Past Due Date

Month	Report date 26-Jan	Report date 29-Jan	Report date 30-Jan	Report date 31-Jan	Report date	Report date
Oct	10	10	8	7		
Nov	43	31	19	18		
Dec	769	788	680	567		
Jan	1116	1847	3251	3309		
Total	1938	2676	3958	3901		

TOTALS	2457	3161	4446	4460		
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**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 6



Marcel D. Henry
Vice President

Two Northwinds Center
2520 Northwinds Parkway
Alpharette, GA 30004

October 10, 2000

Virginia Ruesterholz
Sr. Vice President - Wholesale Services
Verizon
1095 Avenue of the Americas
New York, New York 10036

Dear Virginia,

WorldCom continues to experience problems resolving issues with the Missing Notifier backlog associated with UNE-Platform orders. Backlogs in New York were a problem early last year and although progress has been made, the current backlog dates back to June 2000. Now, an unacceptable backlog exists in Pennsylvania. The backlog impacts our ability to service WorldCom's customers. Failures in an electronic system designed to flow through both Verizon's and WorldCom's customer support systems cause numerous problems including but not limited to, duplicate customer billing.

WorldCom's system support team escalated this issue to Peg Ricca resulting in an October 3 call with Verizon. Progress was made identifying several root causes so that the clearing of the backlog can begin. Why should it take escalation to Peg in order to get the Verizon Help Desk to perform their job? Is the PON exception Help Desk responsible for managing manual fallout and CLEC trouble tickets by performing root cause analysis, identifying problems and facilitating the installation of timely software fixes?

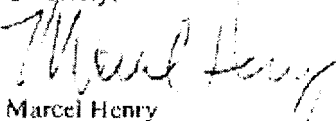
As of August 31, the backlog in Pennsylvania was over 230 orders. At the end of September, the Pennsylvania backlog had grown to over 1,800 orders and New York backlog which dates back to June 2000 was over 1,500 orders. How many orders does it take to recognize that problems exist?

To date, WorldCom still does not have a specific date by which the backlog will be cleared. In addition, several system issues have been identified without a specific fix date. The following are examples of system problems:

- Post Completion Discrepancy Errors
- Out of Sequence / timing conditions
 - BCNs completing before PCNs
 - Migration Change and Records processing out of sequence.

WorldCom request your attention to these issues so that a clear resolution with confirmed dates can be communicated to our Information Technology and System Support teams, and more importantly allow WorldCom to effectively support our customers. Please respond by October 16, 2000.

Sincerely,



Marcel Henry

cc: Peg Ricca